

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MICHAEL McCARTHY, et al.

Plaintiffs,

v.

CHARLES D. BAKER, in his Official Capacity as Governor of the Commonwealth of Massachusetts and in his Individual Capacity; et al.

Defendants.

CONSOLIDATED ACTIONS

CIVIL ACTION
NO. 1:20-cv-10701-DPW

CEDRONE, LLC d/b/a SHAWSHEEN FIREARMS; et al.

Plaintiffs,

v.

CHARLES DUANE BAKER, in his capacity as GOVERNOR OF THE COMMONWEALTH OF MASSACHUSETTS; and MAURA T. HEALEY, in her capacity as ATTORNEY GENERAL OF THE COMMONWEALTH OF MASSACHUSETTS,

Defendants.

CIVIL ACTION
NO. 1:20-cv-40041-DPW

**COMMONWEALTH DEFENDANTS' ASSENTED TO MOTION FOR LEAVE TO FILE
CONSOLIDATED MEMORANDUM IN EXCESS OF PAGE LIMITATION IN
SUPPORT OF MOTIONS TO DISMISS**

Defendants, Governor Baker, Attorney General Healey, and Commissioners Bharel and Gagnon (the “Defendants”), respectfully move this Court for leave to file one consolidated memorandum of law of up to twenty (25) pages in support of motions to dismiss each of these consolidated cases. In support of this motion, Defendants state the following:

1. These two matters have been consolidated by Order of Court. [*McCarthy* Doc. No. 30, *Cedrone* Doc. No. 11.]
2. The Plaintiffs in these two cases raise similar and overlapping claims.
3. Defendants in each case intend to move to dismiss on similar or overlapping theories.
4. Filing a single consolidated memorandum of law that addresses the grounds for dismissal in these two cases would be more efficient than filing a memorandum in each case that covers substantially the same arguments. To the extent that certain arguments are made to dismiss one case but not the other, Defendants will attempt to so note.
5. As set forth in Local Rule 7.1(b)(4), there is a twenty-page limit to memoranda in support of motions, except with leave of Court.
6. The Commonwealth Defendants seek leave to file a consolidated memorandum of up to twenty-five (25) pages. This limit is fifteen (15) pages less than the Defendants would be entitled to file if the memorandum were not consolidated.
7. All parties assent to this motion.

WHEREFORE the Commonwealth Defendants respectfully request that the Court grant this motion for leave to file a single consolidated memorandum of up to twenty-five (25) pages in support of a motion to dismiss each of these consolidated cases.

Respectfully submitted,

MAURA HEALEY
ATTORNEY GENERAL

/s/ Gary Klein

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Dated: May 22, 2020

LOCAL RULE 7.1 CERTIFICATE

I certify pursuant to Local Rule 7.1(a)(2) that all parties assent to the requested relief.

/s/ Gary Klein
Gary Klein

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF).

/s/ Gary Klein
Gary Klein